

HOFFMANN & ASSOCIATES
Attorneys at Law
450 Seventh Avenue, Suite 1000
New York, New York 10014
Tel. (212) 679-0400
Fax (212) 679-1080

ANDREW S. HOFFMANN

TRAM D. LOPRESTO

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: March 3, 2021

March 1, 2021

VIA ECF

Hon. Victor Marrero
United States District Judge
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Cosmopolitan Interior NY
Corporation v. District Council 9
International Union of Painters and
Allied Trades
Index No.: 19-cv-02669 (VM)(KNF)*

Dear Judge Marrero,

We write to advise the Court that we were today retained by defendant District Council 9, International Union of Painters and Allied Trades to serve as primary counsel of record in the above-captioned matter. Unfortunately, Giacchino Russo, who has handled this case for defendant up until the present, is unable to continue in such capacity due to health issues.


As per Your Honor's recent Order, we have conferred with counsel for plaintiff and jointly and respectfully propose that the trial of this matter commence before the Court on September 27, 2021. The parties anticipate that the trial in this case will require approximately seven (7) days to complete.

We also write to respectfully request that Your Honor extend the time for the parties to submit a joint pre-trial order and the other documents required under Your Honor's rules for an additional forty five (45) days until May 14, 2021. Given that we are brand new to the case, we believe that we will not have sufficient time to fully digest the extensive discovery that has been undertaken in this case so that we are able to complete our portion of the pre-trial order and other required filings by the current date of April 1, 2021.

Adam Weiss, counsel for plaintiff, has no objection to our request for this extension of time.

Respectfully submitted,

/s/Andrew S. Hoffmann
Andrew S. Hoffmann

Request GRANTED.	
Trial is hereby scheduled to commence on September 27, 2021. The joint pretrial order shall be due by August 23, 2021.	
SO ORDERED.	 VICTOR MARRERO, U.S.D.J.
March 3, 2021	
DATE	